

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

In re:

LECLAIRRYAN PLLC,

Debtor.

Chapter 7

Case No. 19-34574 (KRH)

Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,

v.

Adv. Proc. Nos. 20-03142 (KRH)

and

ULX Partners, LLC, UnitedLex Corporation,
and ULX Managers, LLC

21-03095 (KRH).

Defendants.

Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,

v.

CVC Capital Partners, Daniel Reed, Nicholas
Hinton, Josh Rosenfeld, P. Douglas Benson

Defendants.

NOTICE OF OBJECTION AND HEARING THEREON

PLEASE TAKE NOTICE THAT the United States Trustee has filed with the Court a **Supplemental Objection** (the “Objection”) to the *Chapter 7 Trustee’s Chapter 7 Trustee’s Sealed Motion* (Main Dkt. 1328 and Dkt. 211 and Reed Dkt. 56) (collectively, the “9019

Kathryn R. Montgomery, AUST (VSB No. 42380)
Shannon Pecoraro, Esq. (VSB No. 46864)
Jason B. Shorter, Esq. (VSB No. 80929)
Office of the United States Trustee
701 East Broad Street, Suite 4304
Richmond, VA 23219
Telephone: (804) 771-2310
Facsimile: (704) 771-2330

Motion”).¹ The United States Trustee’s Objection is being filed under seal pending the Court’s ruling on the *ULX Partners, LLC’s, UnitedLex Corporation’s, and ULX Manager, LLC’s Motion to Seal Settlement Agreement and Related Documents, Information and Hearings* (Main Dkt. 1325 and Dkt. 207) (the “Seal Motion”), originally heard on May 25, 2022, and continued until June 8, 2022 at 1 p.m. Thereafter, the Objection will be served as provided in any Order addressing the Seal Motion.

Furthermore, a copy of the Objection may be received by any Person (as defined by Section 101(41) of the Bankruptcy Code) holding a claim against the Estate evidenced by (i) a proof of claim, which claim is not otherwise subject to dispute pursuant to the Bankruptcy Code and/or the Bankruptcy Rules and/or (ii) an order of the Bankruptcy Court, only upon written receipt by Paula S. Beran, Esquire at pberan@tb-lawfirm.com of a commitment of any Person to keep such Motion confidential

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

PLEASE TAKE FURTHER NOTICE that on September 4, 2019, the Court entered the Order Establishing Certain Notice, Case Management and Administrative Procedures [ECF No. 38 in the main case] (the “Case Management Order”), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the “Case Management Procedures”). The Case Management Procedures, among other things, prescribe the way Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to mckee@gtlaw.com, or, for a fee, at <http://ecf.vaeb.uscourts.gov>.

(X) A hearing to consider the 9019 Motion and any objection thereto is scheduled for **June 8, 2022, at 1:00 p.m., prevailing Eastern Time**, before the Honorable Judge Kevin R. Huennekens.

REMOTE HEARING INFORMATION: Due to the COVID–19 public health emergency, no in-person hearings are being held. This hearing will take place remotely through Zoom on the date and time scheduled herein.

To appear at the hearing, you must use the following Zoom registration link:

<https://www.zoomgov.com/meeting/register/vJItc--rrz4jHfonPb6c3FARuCippfQvj4g>

Listen-only conference line:

Dial: 1-866-590-5055
Access Code: 4377075
Security Code: 6822

¹ “Main Dkt.” refers to the docket in the main Bankruptcy Case. “Dkt.” refers to the docket in the United Lex Adversary Proceeding, while “Reed Dkt.” refers to the docket in the Reed Adversary Proceeding.

Respectfully Submitted,

Dated: June 3, 2022

JOHN P. FITZGERALD, III
Acting United States Trustee Region 4

By: /s/Kathryn R. Montgomery
Kathryn R. Montgomery (VSB 42380)
Assistant United States Trustee
Office of the United States Trustee
701 E. Broad St., Ste. 4304
Richmond, VA 23219
Ph: (804) 771-2310
Fax: (804) 771-2330
Kathryn.Montgomery@usdoj.gov

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of June, 2022, a true and correct copy of the foregoing document was served via first class mail and/or electronic mail upon: (i) all parties and counsel requesting service via the Court's ECF system, (ii) the Defendants, (iii) the 20 largest unsecured creditors as listed on the Debtor's schedules, (iv) the Service List as defined by the governing Case Management Order, (v) Foley & Lardner, (vi) all Persons identified in paragraph 4 of the FAO Procedures Order, and (vii) counsel for the Chapter 7 Trustee.

By: /s/ Kathryn R. Montgomery
Kathryn R. Montgomery, Esq.